

# **Def.'s Ex. 1**

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

TEMOR S. SHARIFI,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant

)  
)  
) No. 16-1090 L  
)  
) Judge Victor J. Wolski  
)  
)  
)  
)  
)  
)

**Declaration of Sobia Khattak**

I, Sobia Khattak, make the following declaration:

1. I am over the age of 18 and legally competent and capable of making this

Declaration. I have personal knowledge of the facts contained in this Declaration.

2. I am a Pashto/Farsi/Dari translator and interpreter. I have worked as a translator and interpreter since 2006, giving me more than 10 years of professional experience translating foreign documents to English. I am experienced translating both legal and government documents, among other types of documents. I am actively working as a translator for TransPerfect, a worldwide translation company. I have worked for TransPerfect from 2009 to present.

3. I am a member of the American Translators Association.

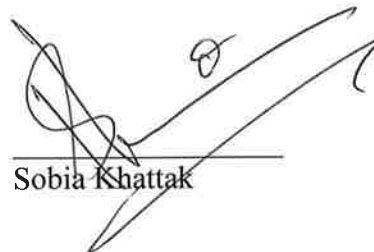
4. I am a native speaker of Urdu/Pashto.

5. I was instructed to proofread Exhibits A, B and C from the Amended Complaint in the above captioned case (ECF No. 10), which were found on pages 5-26 of that filing. Counsel for the United States instructed me to review the non-English portions of Exhibits A through C and render my proofreading in English. The proofread documents are attached to this Declaration.

6. Exhibits A through C were written in Pashto and partially in Dari.
7. All handwritten text is in italics, to distinguish it from the non-handwritten portions of the exhibits.
8. I inserted brackets to mention an untranslatable signature or thumbprint and also to indicate when I was unable to translate an illegible portion of text.
9. I converted Solar calendar dates to their equivalent in the Gregorian calendar.
10. Because Pashto/Dari is read from right to left, I reversed the order of the columns in the charts on several of the pages.
11. I do not make any representation as to the authenticity of Exhibits A, B, or C.
12. To the best of my knowledge, the translation of the documents described above is a true and accurate translation.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 7 day of April, 2017.



Sobia Khattak



Signature, Notary Public



Stamp, Notary Public

## **Exhibit 1.A**

(United States' English Translation of Plaintiff's Ex. A  
to the Amended Complaint, pages 5-10 (ECF No. 10))

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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Identity and Address of the plaintiff:

Serial No.: 259035

Name: *Haji Abdul Latif son of Abdul Ghafoor son of Haji Mohammad Sharif Khan*

Fee: 3 Afghani

Date: *June 03, 2012*Name of the Husband (if the plaintiff is the wife): *Inheritor of Haji Mohammad Sharifi*

Name and Address accused

National Identity No		<i>We file this to get compensated for our lands</i>	Name	Father's Name	Grandfather's Name
House No.	Phone No.		House Phone No.		Phone No.
Alley and St.	Village: <i>Deh Kochi</i>		Alley and St.		Village
Region	Neighborhood		City		Neighborhood
City	Town: <i>Arghandab</i>		Province		Town
Province: <i>Kandahar</i>	Province		Work Address		Province
Work Address	Phone No.		Phone No.		Phone No.

*To the District Governor of Arghandab,*

*We have a piece of land (6 Jerib) and three houses located in Deh Kochi, Arghandab. The US Army occupied our land in October 2010 and built a military base on our land. I kindly request you to arrange for compensation to be paid to us.*

[fingerprint]

## [EXHIBIT A]

Name and Surname of the Officer:	Work Address	Phone No.	Signature
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Name of the Plaintiff:

Father's Name:

Serial No. 259035

Subject of Petition:

Date of Petition Submission  
Number

Date of application for approval

Registration and Page

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

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*I, the head of city council of Arghandab, hereby verify that a piece of 6 Jerib land property located at the village of Deh Kochi, is taken by the US Army. They have not paid rent or compensation for the past two years.*

[signature]

*Haji Shah Mohammad Ahmadi*  
*District Governor of Arghandab*

[stamp:]  
The Islamic Republic of Afghanistan  
Independent Department of Local Governance  
Department of Administrative Affairs and Finance  
Founded: 2007  
Province (Kandahar)

Arghandab District

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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Identity and Address of the plaintiff:

Serial No.: 808268

Name: *Inheritors of Haji Mohammad Sharif Khan* Fee: 3 AfghaniDate: *December 07, 2010*

Name of the Husband (if the plaintiff is the wife):

Name and Address accused

National Identity No			Name	Father's Name	Grandfather's Name
House No.	Phone No.		House Phone No.		Phone No.
Alley and St.	Village:		Alley and St.		Village
Region: <i>I</i>	Neighborhood		City		Neighborhood
City: Banawari	Town:		Province		Town
Province: <i>Kandahar</i>	Province		Work Address		Province
Work Address	Phone No.		Phone No.		Phone No.

*To the Provincial Governor of Kandahar,**Dear Sir,*

*We have a piece of land (6 Jerib) and three houses located in Deh Kochi, Arghandab. The US Army has demolished our houses and built a permanent military base on the land. We would like to draw your attention to this matter and kindly request you to refer our complaint to relevant authorities to compensate us for the demolished houses with due rent of the past and set a monthly rent for the above stated land.*

*Regards,**Ahmad Shah Sharifi*

[fingerprint]

*To the District Governor of Arghandab,**Please check the ownership of the mentioned land and inform us of the same.**Governor of Kandahar**January 03, 2011*

[signature]

Name and Surname of the Officer: [illegible]	Work Address: [illegible]	Phone No.	Signature
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Name of the Plaintiff:

Father's Name:

Serial No. 808268

Date of Petition Submission

Date of application for approval

Registration and Page Number

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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Serial No.: 803268

[stamp:]

The Islamic Republic of Afghanistan  
Independent Directorate of Local Governance  
Department of Administrative Affairs and Finance  
Founded: 2007  
Arghandab District, Kandahar Province

[stamp:] [illegible]



*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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Identity and Address of the plaintiff:

Name: *Temor Shah Sharifi Son of Abdul Ghafoor* Fee: 3 Afghani

Serial No.: 659058

Date: *December 07, 2010*

Name of the Husband (if the plaintiff is the wife):

Name and Address accused

National Identity No.		<i>My Contact details</i> <i>Email Address:</i> <i>sharifi4@verizon.net</i> <i>001-610-5137816</i>	Name	Father's Name	Grandfather's Name
House No.	Phone No.		House Phone No.		Phone Number
Alley and St.	Village:		Alley and St.		Village
Region: <i>I</i>	Neighborhood		City		Neighborhood
City: <i>Khaarwaali</i>	Town:		Province		Town
Province: <i>Kandahar</i>	Province: <i>Kandahar</i>		Work Address		Province
Work Address	Phone No.		Phone No.		Phone Number

*Dear Governor of Kandahar*

*I am writing this petition to inform you that I, Temor Shah Sharifi, Son of Abdul Ghafoor, and grandson of Mohammad Sharif own a piece of land in Deh Kochi, Arghandab. The US Army has constructed a military base named Millet on this piece of land in October 2010. I had their interpreter to submit them all the supporting documents I had in hand to prove my ownership but I haven't received any response from their end.*

*I have written my contact number and email. Due to my 6 Jeribs of demolished land, I need cooperation of Kandahar Provincial Governor's Office and the District Governor of Arghandab. I kindly request you to fully cooperate with me in this case.*

*Regards,**Temor Shah Sharifi*

[fingerprint]

Name and Surname of the Officer: [illegible]	Work Address: [illegible]	Phone No.	Signature
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Name of the Plaintiff:

Father's Name:

Serial No. 659058

Date of Petition Submission

Date of application for approval

Registration and page number

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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[signature]

[stamp:] [illegible]

*July 17, 2012*

*To the District Governor of Arghandab,*

*Please resolve this issue according to the law and regulations.*

[signature]

*Kandahar Provincial Governor's Office*

## **Exhibit 1.B**

(United States' English Translation of Plaintiff's Ex. B  
to the Amended Complaint, pages 16-17 (ECF No. 10))

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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**786**  
***Inheritance Agreement***

*April 19, 2004*

*We, Haji Abdul Latif, Abdul Razagh, Ahmad Shah, Temor Shah, Raa Gul, Ziwar Gul, Bibi Masoma and Bibi Jamila, the inheritors of Haji Abdul Ghafoor Khan Son of Haji Mohammad Sharif Khan hereby state that:*

*We are the heir of our late father, Haji Abdul Ghafoor Khan and we are willingly and with satisfaction of all dividing the property of our late father by considering the current market value as below:*

*It is agreed that the Land of Arghandab belongs to Haji Abdul Latif, Abdul Razaq, Ahmad Shah, Raa Gul and Bibi Ziwar Gul while Land of Deh Kochi (Morghan) belongs to Temor Shah and his sisters, Bibi Jamila and Bibi Masuma.*

*It is agreed that 7.5 Jeribs of the garden and vineyards of Murghaan (Deh Kochi) and farms by having an area of 6 Jeribs is totally 13.5 Jerib of land property in total and it has an estimated value of about eight hundred thousand Pakistani Rupees per Jerib belongs to Temor Shah and his sisters mentioned above. The land property has been consolidated and given to its owners.*

*All brothers and sisters have their shares in property of Toop Khana Yard and Mansoor Kala which is not divided yet.*

*This statement is made with the confirmation and satisfaction of all heirs of the family for the validity of this Inheritance Agreement.*

[EXHIBIT B]

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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*Moreover, we all agree that 2 Jeribs of our father's property in Deh Kochi would be allocated to building of a mosque and a house for Abdul Latif, Abdul Razagh, Ahmad Shah and Temor Shah.*

*The piece of land known as Mazar Baba which is of 38 Jeribs will be sold in the future and the money will be used for building the Masjid and four houses mentioned above. These few lines were added on this extra page and all parties are in agreement with the same.*

*We, brothers and sisters, all agree to this written agreement.*

*Abdul Latif*  
[signature]

*Abdul Razagh*  
[signature]

*Ahmad Shah*  
[signature]

*Temor Shah*  
[signature]

*Bibi Ziwar Gula*  
Thumb impression

*Masuma*  
Thumb impression

*Jamila*  
[Finger Print]

*Witnesses:*

*Asadullah*  
[signature]

*Hafizullah*  
[signature]

*I, the District Governor of Arghandab, hereby approve that this inheritance agreement is made between the parties.*

[signature]

*Haji Shah Mohammad Ahmadi*  
[signature]

*District Governor of Arghandab*

[stamp:]

The Islamic Republic of Afghanistan

Independent Department of Local Governance

Department of Administrative Affairs and Finance

Founded: 2007

Province (Kandahar)

Arghandab District

## **Exhibit 1.C**

(United States' English Translation of Plaintiff's Ex. C  
to the Amended Complaint, pages 21-23 (ECF No. 10))

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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Identity and Address of the Complainant:

Serial No.: 7949983

Name: *Temor Shah Sharifi Son of Abdul Ghafoor*, Fee: *5 Afghani* Date: *December 12, 2016*Name of the Husband (if the Complainant is the wife): *Inheritor of Haji Mohammad Sharifi*

Name and Address accused

National Identity No			Name	Father's Name	Grandfather's Name
House No.	Phone No.		House Phone No.		Phone No.
Alley and St.	Village: <i>Deh Kochi</i>		Alley and St.		Village
Region: 1	Neighborhood		City		Neighborhood
City	Town: <i>Arghandab</i>		Province		Town
Province: <i>Kandahar</i>	Province:		Work Address		Province
Work Address	Phone No.		Phone No.		Phone No.

*To the District Governor of the Arghandab, Kandahar Province,*

*We, as the inheritors of Mohammad Sharif Khan and (grandsons of Abdul Ghafoor Khan) confirm to the following statement on April 19, 2004 between our family members.*

*We accept the divided land property of Arghandab district, located in Tabin (Murghan) (Deh Kochi) area. A piece of land located in Deh Kochi with the size of 6 Jerib as part of this land which I (Temor Shah Sharifi) inherited from my grandfather is taken by the US Army since October 2010 and a military base was built on the land. Now the structure is transferred to the Afghan military. The location of the land and its specifications are clearly shown on the sketch attached.*

*We kindly request you to verify the sketch and the ownership of this land (of 6 Jerib) belonging to myself Temor Shah Sharifi. We really appreciate your attention in this matter.*

*Note: Attached to this document you can find:*

*Inheritance notes and sketch of Deh Kochi land and other supporting documents.*

[EXHIBIT C]

Name and Surname of the Officer:	Place of work:	License No	Signature <i>Temor Shah Sharifi</i> <i>December 12, 2016</i>
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Name of the Complainant:

Father's Name:

Serial No. 7949983

Subject of Petition:

Date of Petition Submission

Date of application for approval

*[handwritten text in italics]*

[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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*I (the district governor of Arghandab) approve that Temor Shah Sharifi owns a land property of 6 Jeribs located in Deh Kochi area.*

*Regards,*

*Sincerely,*

*Haji Shah Mohammad Ahmadi*

*[signature]*

*District Governor of Arghandab*

*[stamp:]*

*The Islamic Republic of Afghanistan*

*Independent Department of Local Governance*

*Administrative Affairs and Finance Office*

*Founded: 2007*

*Province (Kandahar)*

*Arghandab District*



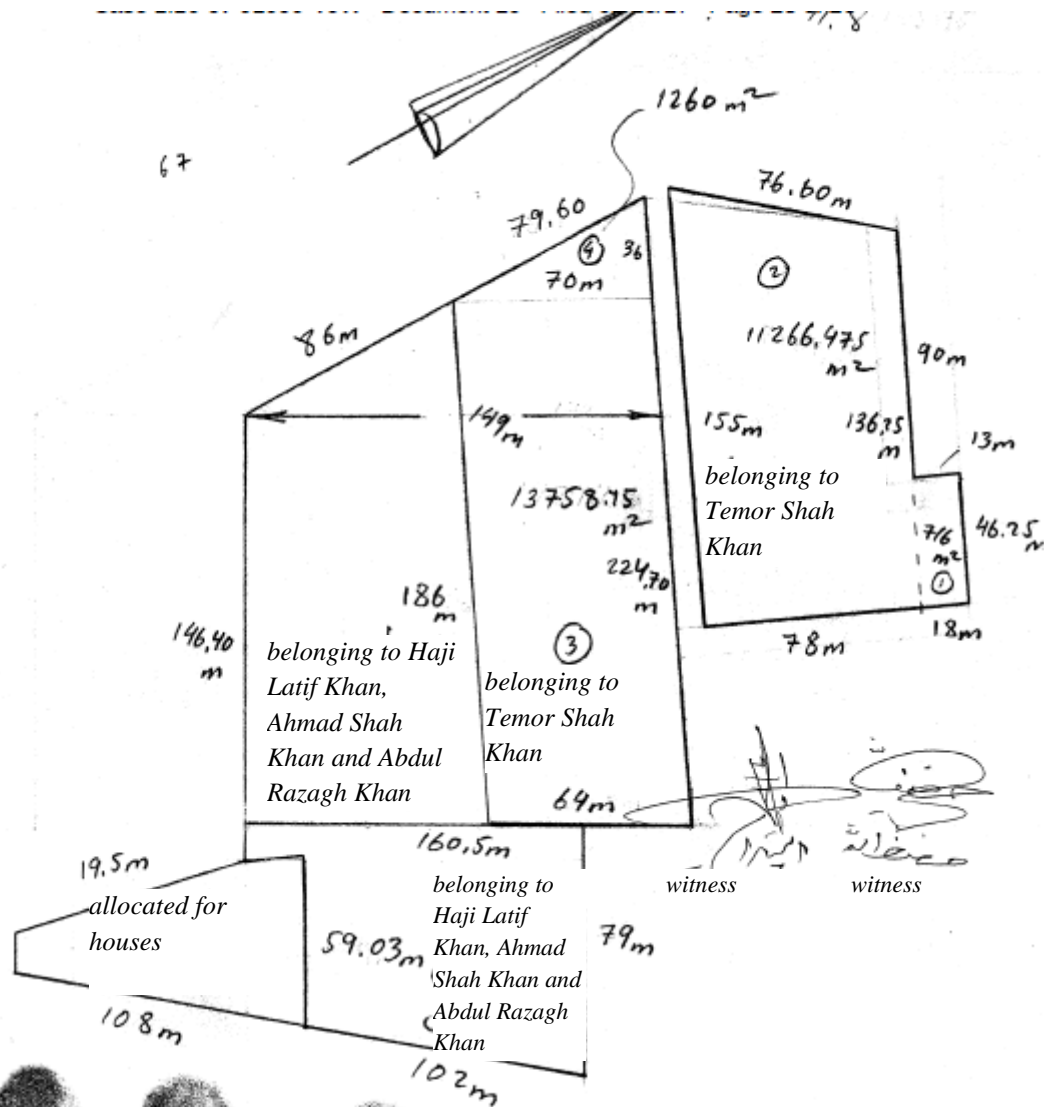
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[Case 1:16-cv-01090-VJW]

[Document 10]

[Filed 02/15/17]

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[signature]



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[signature]

$$\textcircled{1}-\textcircled{2} = 12000 \text{ m}^2$$

$$\textcircled{3} = 13758.45 \text{ m}^2$$

$$\textcircled{4} = 1260 \text{ m}^2$$

27018

13 jeribs

[illegible]